

III. REMARKS

Claims 1-27 are pending in this application. By this Amendment, claims 23 and 25-27 have been amended. Reconsideration in view of the above amendments and following remarks is respectfully requested.

In the Office Action, claims 1-3, 10-15, 22-13, and 26 are rejected under 35 U.S.C. §103(a) as being unpatentable over Anderson et al. (US patent no 6,154,576), hereafter "Anderson," in view of Deering (US patent no. 6,489,956), hereafter "Deering." (As an initial comment, Applicants note that particular citations to Anderson and Deering in the Office Action appear to be accidentally switched. Applicants have addressed the rejection based on this assumption.) Applicants submit that the pending claims are patentable and the above rejection should be withdrawn.

With regard to claims 1, 10, 23 and 26, the combination of Deering in view of Anderson does not render the claimed invention obvious to a person having ordinary skill in the art. To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. In Re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fe. Cir. 1991). In the claimed invention, a rotated image is created using weighted sums of data points of the first (or initial) image, wherein weighting depends on a skew angle of the first (or initial) image and data point location in the first (or initial) image. In contrast, Deering uses distance from a sample to the center of an output pixel being generated to calculate weighting. (Note, col. 23, lines 62-64). Deering ensures that the samples located the

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closest to the pixel center will contribute the most, while pixels located the farthest from the pixel center will contribute the least to the final output pixel values. (Note, col. 23, line 62 to col. 24, line 8; and col. 24, line 63 to col. 25, line 1). Accordingly, *inter alia*, a skew angle is not considered in Deering. In addition, because only samples, instead of an initial image, are used in Deering's method, there is no skew angle. Anderson fails to overcome this shortcoming. Therefore, the disclosure of Deering and Anderson does not make this invention obvious.

Furthermore, with regard to claims 1, 10, 23 and 26, a rotated image depends on data points of the first (or initial) image. In Deering, multiple samples of the same data point, which are calculated to obtain various information about the data point, are selectively filtered to get the desired data point. (Note col. 3, lines 16-19; col. 18, lines 49-65; and col. 26, lines 33-37). Accordingly, the procedure of Deering is more complicated than this invention.

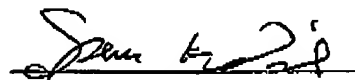
In view of the foregoing, Applicants respectfully request withdrawal of the rejection.

The revisions to claims 23, 25 and 27 have been provided solely to correct typographical errors.

Applicants appreciate the indication that claims 4-9, 16-21, 24-25 and 27 would be allowable if rewritten in independent form. However, as discussed above, Applicants do not believe that is necessary.

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, he is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,


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